

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRIAN FLORES, STEVE WILKS and RAY HORTON, as Class Representatives, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

THE NATIONAL FOOTBALL LEAGUE; NEW YORK FOOTBALL GIANTS, INC. d/b/a NEW YORK GIANTS; MIAMI DOLPHINS, LTD. d/b/a MIAMI DOLPHINS; DENVER BRONCOS FOOTBALL CLUB d/b/a DENVER BRONCOS; HOUSTON NFL HOLDINGS, L.P. d/b/a HOUSTON TEXANS; ARIZONA CARDINALS FOOTBALL CLUB LLC d/b/a ARIZONA CARDINALS; TENNESSEE TITANS ENTERTAINMENT, INC. d/b/a TENNESSEE TITANS and JOHN DOE TEAMS 1 through 26,

Defendants.

Civil Action No.: 22-cv-00871 (VEC)

DEFENDANTS' RULE 7.1 CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendants hereby certify

that:

1. The National Football League is an unincorporated association with no parent corporations. There are no publicly held corporations with an ownership interest of 10% or more in the National Football League.
2. Miami Dolphins, Ltd. is controlled by Fin Associates, LLC, a private limited liability company, which is controlled by Fin 2016, LLC, a private limited liability company.
3. Denver Broncos Team, LLC, d/b/a Denver Broncos Football Club, is a subsidiary of Broncos Holdings, LLC, a private limited liability company.

4. Tennessee Football, Inc. (incorrectly identified in the Complaint as "Tennessee Titans Entertainment, Inc.") is a subsidiary of KSA Industries, Inc., a private corporation.

5. Other than what is listed above, no Defendant has a parent corporation and no publicly held corporation has an ownership interest of 10% or more in any Defendant.

Dated: New York, New York
August 29, 2022

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

By: /s/ Loretta E. Lynch
Loretta E. Lynch
Brad S. Karp
Lynn B. Bayard
Brette Tannenbaum
1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: (212) 373-3000
Fax: (212) 757-3900
lelynch@paulweiss.com
bkarp@paulweiss.com
lbayard@paulweiss.com
btannenbaum@paulweiss.com

*Attorneys for the National Football League, New York
Giants, Miami Dolphins, Denver Broncos, Houston
Texans, Arizona Cardinals and Tennessee Titans*